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9 Attorneys for Claimants
First 100, LLC, 1st One Hundred Holdings, LLC
10 and Battle Born Investments Company, LLC

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 Approximately 69,370 Bitcoin (BTC), Bitcoin
19 Gold (BTG), Bitcoin SV (BSV), and Bitcoin
Cash (BCH) seized from
20 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx,

21 Defendant.

22 First 100, LLC, 1st One Hundred Holdings,
23 LLC, and Battle Born Investments Company,
24 LLC,

25 Claimants.
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Case No. 3:20-cv-07811-RS

**DECLARATION OF MARI SAHAKYAN
CLIFFORD IN SUPPORT OF
STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO STRIKE
THE CLAIMS OF CLAIMANTS BATTLE
BORN INVESTMENTS COMPANY, LLC,
FIRST 100, LLC AND 1ST ONE
HUNDRED HOLDINGS, LLC**

The Hon. Richard Seeborg

Trial Date: None Set

DECLARATION OF MARI SAHAKYAN CLIFFORD

I, Mari Sahakyan Clifford, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an associate with Coblentz Patch Duffy & Bass LLP, attorneys of record for Claimants First 100, LLC, 1st One Hundred Holdings, LLC and Battle Born Investments Company, LLC. I have personal knowledge of the facts stated herein, and if called upon to do so, I could and would personally and competently testify to them.

2. On July 13, 2021, Coblentz Patch Duffy & Bass LLP was retained as counsel by Claimants First 100, LLC, 1st One Hundred Holdings, LLC, and Battle Born Investments Company, LLC ("Claimants").

3. On July 13, 2021, the same day counsel was retained to represent Claimants, Plaintiff filed a Motion to Strike the Claims of Claimants (hereinafter the "Motion").

4. On July 15, 2021, Claimants' counsel contacted Plaintiff and asked to meet and confer about the Motion briefing schedule. That same day, counsels held a telephonic conference. At the meeting, Claimants' counsel explained that they were reaching out to request an extension for filing the opposition to the Motion and would offer a similar extension to Plaintiffs to file their reply.

5. The extension for Claimants to file a response is necessary because Claimants' counsel was only recently retained and requires additional time to become acquainted with the facts of the case in order to competently and thoroughly brief its response to the Motion.

6. Later that same day, Plaintiff sent an email offering a two-week extension. Claimants accepted Plaintiff's offer.

7. Counsel has reviewed the case docket and can confirm there have been no previous time modifications in this case relating to Claimants' claims.

8. The requested modifications would have a minimal effect on the schedule of the case as there is currently no Case Management and Scheduling Order in this matter nor a set trial date. The extension does not affect any current deadlines or hearing dates beyond Claimants'

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1 deadline to file a response to the Motion, Plaintiff's deadline to file a reply, and an approximately
2 three-week delay of the hearing date.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed on this 21st day of July, 2021, at San Francisco, California.

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7 /s/ Mari Sahakyan Clifford
8 MARI SAHAKYAN CLIFFORD
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